NPDES FORM 6100-28		UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 ANNUAL REPORT FOR STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY UNDER THE NPDES MULTI-SECTOR GENERAL PERMIT	FORM Approved OMB No. 2040-0004

Permit Information

Report Year: 2019

NPDES ID: MAR053427

Facility Information

Facility Name: SCHNITZER NORTHEAST - ATTLEBORO

Facility Point of Contact

First Name Middle Initial Last Name: Keri Fitzpatrick

Phone: 781-706-7003 **Ext.:**

Email: kfitzpatrick@schn.com

Facility Mailing Address

Address Line 1: 136 BACON STREET

Address Line 2:

City: ATTLEBORO

ZIP/Postal Code: 02703

State: MA

County or Similar Division: Bristol

General Findings

Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

Facility inspections were completed during dry and wet weather conditions. Facility inspections noted housekeeping conditions such as sweeping, removal of accumulated solids around stormwater structures, haybale replacement, incidental oil spills from mobile equipment, solid waste management and inventory management.

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

During one or more of the quarterly sampling events the stormwater sample collected from the Maintenance Yard was reported to contain cloudiness, floating solids, suspended solids, color, and/or settled solids. During one quarterly sampling event the stormwater sample collected from the Lower Main Yard (west treatment unit) was reported to contain color, settled solids, and an odor. During the first quarter sampling event the stormwater sample collected from the Turner Street Yard was reported to contain floating solids and suspended solids.

For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

Not applicable

Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

In 2019, the average concentrations of copper (0.0567 mg/L), iron (1.335 mg/L), and zinc (0.1835 mg/L) were detected at concentrations greater than the benchmark concentration in the Lower Main Yard outfall. The average concentrations of copper (0.01825 mg/L) and zinc (0.064 mg/L) were detected at concentrations greater than the benchmark concentrations in the Maintenance Yard outfall. The concentration of copper (0.015 mg/L) was detected at a concentration greater than the benchmark concentration in the Turner Street outfall (first quarter). Benchmark concentrations for these outfalls are 0.0056 mg/L (copper), 1 mg/L (iron) and 0.05 mg/L (zinc), respectively.
Overall, the stormwater quality has improved at all outfalls based on historical concentrations. Corrective actions in 2019 included sweeping frequency, removal of solid waste, removal of accumulated solids from around stormwater structures, haybale replacement, mobile equipment maintenance, and inventory management. Historical analytical data and owner/operator knowledge demonstrates that housekeeping and inventory levels contribute to stormwater quality. The housekeeping (i.e. sweeping) is consistently adjusted based on inventory levels and weather conditions to achieve the highest stormwater quality. This is an iterative process that will continue to be ongoing in 2020.

Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Certified By: Keri A. Beck

Certifier Title: Mrs

Certifier Email: kfitzpatrick@schn.com

Certified On: 01/29/2020 7:26 PM ET